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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

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14 JASON PEREZ,

No. 2:23-cv-00396-JDP (SS)

15 Plaintiff,

STIPULATED MOTION AND [PROPOSED]
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

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17 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

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Defendant.

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IT IS HEREBY STIPULATED, by and between the parties through their respective
counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
Motion for Summary Judgment be extended thirty (30) days from September 25, 2023 to October
25, 2023. This is Defendant's first request for an extension. Counsel for Plaintiff has no
objection to Defendant's request for an extension.

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Good cause exists for this request. Defendant respectfully requests this additional time
because Counsel for Defendant has and will be unable to devote the time required to complete its
response. Counsel for Defendant was unexpectedly out of the office September 15, 2023 and will

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1 need to be out of the September 21-22, 2023 and currently has 3 briefs all due September 25,
2 2023. Counsel has been unable to finalize the response to Plaintiff's Motion for Summary
3 Judgment given these competing workload requirements. Given this situation and other workload
4 requirements an extension until October 25, 2023 will provide the opportunity for the
5 undersigned Counsel for Defendant to prioritize completing the response to Plaintiff's Motion for
6 Summary Judgment. Furthermore, a reassignment of this matter to another staff attorney is
7 currently not tenable given the high volume of cases that all of our limited staff is handling.
8 Counsel apologizes to the Court for any inconvenience caused by this delay and does not
9 anticipate the need for any further extensions. All other dates in the Court's Scheduling Order
10 shall be extended accordingly.

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Respectfully submitted,

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PHILLIP A. TALBERT
United States Attorney

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DATE: September 21, 2023

By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorneys for Defendant

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Respectfully submitted,

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Attorneys for Plaintiff

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DATE: September 21, 2023

By: s/ Stuart T. Barasch
Stuart T. Barasch, Esq.
Of Counsel, Olinsky Law Group
(*as authorized by email)

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ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including October 25, 2023, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: September 26, 2023

Jeremy Peterson
JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE